

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

YELLOW CORPORATION, *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 23-11069 (CTG)
)
) (Jointly Administered)
)
) **Re: Docket No. 998**

**CERTIFICATION OF COUNSEL REGARDING DEBTORS' MOTION FOR ENTRY
OF AN ORDER AUTHORIZING PARTIES, INCLUDING THE DEBTORS
EXCLUSIVE BROKER AND AUCTIONEER OF ROLLING STOCK ASSETS, TO FILE
UNDER SEAL THE NAMES OF CERTAIN CONFIDENTIAL PARTIES IN INTEREST
IN CONNECTION WITH THE ROLLING STOCK SALE PROCESS**

The undersigned hereby certifies that:

1. On October 30, 2023, the above-captioned debtors and debtors in possession (collectively, the “Debtors”) filed the *Debtors' Motion for Entry of an Order Authorizing Parties, Including the Debtors Exclusive Broker and Auctioneer of Rolling Stock Assets, to File Under Seal the Names of Certain Confidential Parties In Interest in Connection with the Rolling Stock Sale Process* [Docket No. 998] (the “Motion”).

2. The deadline to respond to the Motion was November 6, 2023 at 4:00 p.m. Eastern Time (the “Objection Deadline”).

3. The Debtors received informal comments from the Office of the United States Trustee (“UST”).

4. Attached hereto as Exhibit A is a revised proposed form of order (the “Revised Proposed Order”) that has been circulated to the UST, which does not object to entry of the

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of the Debtors’ principal place of business and the Debtors’ service address in these chapter 11 cases is: 11500 Outlook Street, Suite 400, Overland Park, Kansas 66211.

Revised Proposed Order. Attached hereto as Exhibit B is a redline of the Revised Proposed Order showing changes against the order filed with the Motion.

5. Accordingly, the Debtors respectfully request entry of the Revised Proposed Order at the Court's earliest convenience.

Dated: November 8, 2023
Wilmington, Delaware

/s/ Peter J. Keane

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